

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: <b>TERRANCE W. OBIE</b> , aka Terrance	>:	<b>Chapter 13</b>
Ward Obie, aka Terrance Obie, fdba	:	Case No. <b>5:15-bk-03521-RNO</b>
Obie One Home Services, and	:	
<b>CALANDRA D. OBIE</b> , aka	:	
Calandra Danielle Obie, aka	:	
Calandra Obie	:	
Debtors,	:	

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<b>PNC BANK, NA</b> ,	:	
Movant	:	Motion for
v.	:	Relief from Stay
<b>TERRANCE W. OBIE, CALANDRA D. OBIE</b> and	:	
<b>CHARLES J. DEHART, III, TRUSTEE</b> ,	:	
Respondents	:	

**ANSWER TO MOTION OF PNC BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **TERRANCE W. OBIE** and **CALANDRA D. OBIE**, by and through their attorneys, **NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C.**, and in Answer to the Motion of **PNC BANK** for Relief from Stay avers:

- 1-2. Admitted.
3. Denied. The Trustee is the Standing Trustee, and selected by the Office of United States Trustee.
4. Denied to the extent the documents referenced to not speak for themselves.
5. Admitted.
6. Denied. In addition to the payments acknowledged on the payment history filed with the Motion, Debtors paid \$2,500 on September 29, 2018, in cash, at a PNC Bank branch.
7. Denied. See response to paragraph 6. The amount necessary to bring the loan postpetition current is \$2,750.94 or less, not counting the October 1, 2018 payment.

8. Denied to the extent paragraph 8 is other than a statement or conclusion of law or misplaced request for relief.

9. Denied to the extent paragraph 9 is other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor(s) **TERRANCE W. OBIE** and **CALANDRA D. OBIE** respectfully pray this Honorable Court for an Order than the Motion of **PNC BANK** for Relief from Stay be Denied, or, in the alternative, for an adequate protection order that the stay be conditioned on future mortgage payments and cure of any postpetition arrears, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,  
CORVELEYN, WOLFE & FARERI, P.C.

By: /s/ J. Zac Christman

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